From: <u>Snyderman, Steven</u>

To: Steeger, Thomas; Garber, Kristina; Jakob, Avivah; Farruggia, Frank; Louie-Juzwiak, Rosanna; Wolf, James;

Parrott, Patricia; Spatz, Dana; Sappington, Keith; Moriarty, Thomas

Cc: <u>Cyran, Carissa</u>; <u>Russell Wasem</u>

Subject: Dinotefuran: Mitsui Chemicals Meeting to Discuss DCI

 Start:
 Wednesday, May 01, 2013 1:00:00 PM

 End:
 Wednesday, May 01, 2013 2:00:00 PM

 Location:
 DCRoomPYS9621/Potomac-Yard-One

Attachments: 236-141 Dinotefuran Mysid DER HK Comments final.docx

Aerobic and anaerobic aquatic degradation DER comments 18April2013.docx

Agenda Dinotefuran DCI - 24 APR 13 v3.docx

When: Wednesday, May 01, 2013 1:00 PM-2:00 PM (GMT-05:00) Eastern Time (US & Canada).

Where: DCRoomPYS9621/Potomac-Yard-One

Note: The GMT offset above does not reflect daylight saving time adjustments.

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MITSUI CHEMICALS AGRO, INC. / EPA

Dinotefuran DCI - Discussion of EFED Data Requirements

Wednesday, May 1st, 2013 1 p.m.

Attendees:

Steven Snyderman Chemical Review Manager, RMIB III

TBD EPA EFED

Lisa Setliff MCAG/LANDIS INTERNATIONAL, INC.

Dennis Hattermann MCAG/LANDIS INTERNATIONAL, INC.

Rob Hummel MCAG/LANDIS INTERNATIONAL, INC.

Lindsey Sorensen MCAG/LANDIS INTERNATIONAL, INC.

Agenda:

Introductions (Lindsey Sorensen/Steven Snyderman)

Purpose Overview (Lindsey Sorensen)

Dinotefuran DCI Studies (Lindsey Sorensen)

Anaerobic Aquatic Metabolism

Review deficiencies in DER and rebuttal document prepared by Landis and laboratory.

Identify any further items needed to address study deficiency.

Identify submission classification for rebuttal.

Mysid Chronic Toxicity Testing

Review deficiencies in DER and rebuttal document prepared by Landis and laboratory.

Identify any further items needed to address study deficiency.

Identify submission classification for rebuttal.

Pollinator Larval Toxicity Testing (SS-1156)

Identify EPA's data goals and endpoints for risk assessment.

Discuss OECD Draft Larval Toxicity Test (version 14 Nov 2012) and desired deviation from OECD draft guideline.

General study discussion and limitations.

Laboratory Pollinator Chronic Feeding Study (SS-1157)

Identify EPA's data goals and endpoints for risk assessment.

General study discussion and limitations.

Field Testing for Pollinators (Semi-Field) (850.3040)

Identify EPA's data goals and endpoints.

Discuss study timeline as it fits into risk assessment process and DCI.

Residues in Pollen and Nectar/Field Residue Analysis

Identify EPA's data goals.

Identify desired application scenarios, crops, hydric regimes.

Discuss DCI language in Footnote 3 (refer to text below).

Pollinator Task Force for neonicotinoids?

Conclusion (LANDIS)

Discussion (All)

Footnote 3: Prior to initiating these studies the registrant must develop and submit to EPA a protocol for review. The draft protocol must be submitted to the Agency within 90 days of receipt of the draft DCI.

Development of monitoring protocols should be mindful of the following important goals as the Agency advances this and similar compounds to regulatory decision:

- 1. Establish a set of empirical pollen and nectar residue data to allow for a refined pollinator risk assessment for the monitored crops under a variety of application scenarios, soil, and hydric regimes expected to be encountered.
- 2. Provide sufficient information to allow for extrapolation of available pollen and nectar residue data for this particular chemical along with data from other chemicals within the same class to inform a higher tier extrapolation of available residue data from one crop/chemical combination to enhance predictions of residues in other crop/pesticide combinations that have not directly been monitored.

When developing monitoring protocols to address the above goals, the registrant is urged to show consideration of the following issues that will likely be important to the Agency's evaluation of the adequacy of the protocol to meet the aforementioned goals:

- a. Attractiveness of the monitored crop to pollinators
- b. Robust representation of soil factors important to uptake of the pesticide by plants
- c. Robust representation of soil hydric/meteorological/and transpiration conditions for the crop monitored
- d. Thorough representation of application methods rates and timing
- e. Robust monitored crop selection to allow for a confident extrapolation of residue finding across a given crop grouping
- f. Robust monitoring of residues over time to determine whether annual accumulation in soil occurs or is bioavailable for plant uptake and to establish trends for residues in perennial plant tissues.
- g. Consideration of the market proportion of a given use site.